

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

AMANDA FITTON, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

PINNACLE PROPANE, LLC,

Defendant.

Case No. 3:23-cv-1559

**PLAINTIFF’S UNOPPOSED  
MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Unopposed Motion for Final Approval of Class Action Settlement and all prior pleadings and proceedings had herein, Plaintiff Amanda Fitton, individually and on behalf of the putative class, (“Plaintiff”) moves for an Order awarding final approval of this proposed class action settlement and respectfully requests that this Court:

1. Grant final certification of the Settlement Class for settlement purposes, appoint Plaintiff Amanda Fitton as Class Representative, and appoint Raina C. Borrelli of Strauss Borrelli PLLC as Class Counsel;
2. Approve the requested attorney’s fees of \$163,333.33, costs of \$18,668.33, and Plaintiff’s requested service award in the amount of \$5,000;
3. Find that the Notice met the requirements of due process and Federal Rule of Civil Procedure 23;
4. Find that the terms of the Settlement Agreement fair, reasonable, and adequate and approved, adopted, and incorporated by the Court;

5. Direct the Parties, their respective attorneys, and the Claims Administrator to consummate the Settlement in accordance with the Court Order and the terms of the Settlement Agreement, and;

6. Resolve all claims against all parties in this Action and issue the Proposed Final Approval Order.

This Motion is based on the accompanying Supporting Memorandum; the Declaration of Raina C. Borrelli in Support of Preliminary Approval (Doc. 20-2); the Declaration of Raina C. Borrelli in Support of Plaintiff's Motion to Approve Attorneys' Fees, Costs, and Service Award (Doc. 28-2); the Settlement Agreement (Doc. 20-1 and 24); Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Supporting Memorandum, Supporting Declarations, and attachments (Docs 19-20); and Plaintiff's Motion to Approve Attorney's Fees, Costs, and Service Award and accompanying documents at (Doc. 28); and all other pleadings and papers on file in this action and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for December 3, 2024. Defendant does not oppose the relief sought in this motion.

WHEREFORE, for the reasons above, Plaintiff requests that the Court grant her Motion to for Final Approval of Class Action Settlement

Dated: November 4, 2024

Respectfully submitted,

By: /s/ Raina C. Borrelli  
Raina C. Borrelli (*pro hac vice*)  
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*Attorneys for Plaintiff and the Proposed Class*

**CERTIFICATE OF SERVICE**

I, Raina C. Borrelli, hereby certify that on November 4, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, below, via the ECF system.

DATED this 4th day of November, 2024.

STRAUSS BORRELLI PLLC

By: /s/ Raina C. Borrelli  
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